

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT CINCINNATI

UNITED STATES OF AMERICA,	:	Case No. CR-1-02-100-1
Plaintiff,	:	Judge Rice
vs.	:	<u>DEFENDANT JOVANNI</u>
	:	<u>MANGOTTI'S MOTION</u>
JOVANNI MANGOTTI,	:	<u>FOR CONTINUANCE OF</u>
	:	<u>SENTENCE HEARING</u>
_____Defendant._____	:	

Comes now the defendant, Mr. Jovanni Mangotti, by and through counsel, and hereby moves the Court for a continuance of the sentence hearing date, currently scheduled for June 9, 2005. Mr. Mangotti requests this continuance as a result of discussions last week between the parties. It has come to the attention of defense counsel that the Court has granted certain motions filed pro se, which could have an impact on this case.

Defense counsel can respectfully represent that Assistant U.S. Attorney Amul Thappar does not oppose this motion. Mr. Mangotti is not aware of the co-defendant's position on this matter. Mr. Mangotti respectfully requests that this motion is filed in good faith and is of benefit to all parties.

WHEREFORE, the defendant respectfully requests this motion to be granted such that the sentence hearing date is rescheduled sometime beyond July 6, 2005 and that any sentence memoranda be filed at a an appropriate time with the new sentence date.

Respectfully submitted,

/s/ Kevin J. Spiering

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served electronically to the office of the United States Attorney and counsel for co-defendant on June 6, 2005.

/s/ Kevin J. Spiering